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6 Counsel for Defendant GUZMAN

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR 13-0070 RS (MEJ)  
11 )  
Plaintiff, )  
12 )  
v. ) STIPULATION AND ~~PROPOSED~~  
13 ) ORDER TO MODIFY CONDITIONS OF  
RELEASE  
14 HECTOR JOSE CHAMERRY GUZMAN, )  
15 )  
Defendant. )  
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17 On February 15, 2013, defendant Guzman was released on a \$75,000 unsecured bond  
18 with the condition that he be subject to electronic monitoring and a curfew. Mr. Guzman was  
19 subsequently released from immigration custody with the condition that he be subject to  
20 electronic monitoring. As a result, Mr. Guzman has been wearing two ankle bracelets—one for  
21 immigration and one for district court—since February.

22 Mr. Guzman now requests that the Court modify his conditions of release to remove the  
23 conditions that he be subject to electronic monitoring and a curfew. He has been compliant with  
24 all his conditions of pretrial release for four straight months. He has maintained contact with his  
25 pretrial services officer, obtained employment at a car wash, and continued to care for his five-  
26 year old son. He does not have a drug or alcohol problem. Pretrial Services Officer Anthony

Granados has verified that Mr. Guzman has not had any violations of his conditions of release, and he concurs with the proposal to remove both the electronic monitoring and curfew conditions. He also indicated that Pretrial Services is currently paying for Mr. Guzman's ankle bracelet but they would like Mr. Guzman to start paying for it, and Mr. Guzman does not have the funds to pay.

Mr. Guzman is scheduled to be sentenced on June 25, 2013. Given his excellent behavior on release and compliance with his conditions, as well as the fact that he is unnecessarily wearing two ankle bracelets, Mr. Guzman respectfully requests that the Court remove the conditions that he be subject to electronic monitoring and a curfew. All other conditions shall remain in place. The government does not oppose this request.

IT IS SO STIPULATED.

MELINDA HAAG  
United States Attorney

6/5/13

/s/

DATED

SUZANNE MILES  
Assistant United States Attorney

STEVEN KALAR  
Federal Public Defender

6/5/13

/s/

DATED


RITA BOSWORTH  
Assistant Federal Public Defender

In light of the parties' stipulation, it is hereby ORDERED that the defendant's conditions

1 of release shall be modified such that the conditions that he be subject to electronic monitoring  
2 and a curfew are removed. All other conditions shall remain in place.

3  
4 June 7, 2013

5 DATED

  
6 MARIA ELENA JAMES  
7 United States Magistrate Judge  
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